



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL

Return Receipt Requested

10 MAY 2005

Article Number: 7004 2510 0006 9722 8382

Mr. Joe Haller
Environmental Engineer
Wellman Dynamics Corporation
1746 Commerce Road
Creston, Iowa 50801

Dear Mr. Haller:

RE: Comments on Current Conditions Report for
Wellman Dynamics Corporation
Creston, Iowa
RCRA Facility I.D. No. IAD065218737
Docket No. RCRA-07-2003-0167

The U.S. Environmental Protection Agency (EPA) has completed our review of the Current Conditions Report, dated May 2004, for the above referenced facility. Based on our review, the Current Conditions Report is not adequate to support approval. The Current Conditions Report must be revised in accordance with the comments stated below before EPA can approve it. In accordance with the Administrative Order on Consent, Section IX, please submit the revised document, which addresses our comments, within 30 days of your receipt of this letter.

Comments

1. Page 5, Section 4.3 and Section 4.7: It is unclear if filter cake and wastewater treatment sludge wastes detailed in the text for Solid Waste Management Unit (SWMU) 2 and SWMU 6 are the same wastes. In the event that the waste characterization descriptions are interchangeable the text in this report should explain this. Please review the document for similar details and revise accordingly.
2. Page 10, Section 3.5, Site-Specific Geology and Hydrogeology: The local hydrogeology has not been fully characterized with respect to flow direction and extent of contamination. The need to fully understand the hydrogeology is imperative to completing the RCRA Facility Investigation (RFI). The absence of potentiometric surface maps and hydrogeologic profiles suggests that the monitoring well network should be evaluated thoroughly with respect to understanding contaminant transport and coverage. The Current Conditions Report should emphasize the need for further evaluation of these issues during the next phase of the corrective action process (i.e., RFI).

RCRA



586987



3. Page 10, Section 3.5, paragraph 1, 2nd bullet. Distance from the site to the Middle Platte River is listed as 550 feet, however, other sections, such as 3.1, state that the river is 1000 feet. Please correct this inconsistency throughout the document.
4. Page 16 and 28, Section 4.3.6 and Section 4.8.6, respectively: The Current Wastewater Treatment Sludge Storage Area (SWMU 2) and the Waste Methanol Drum Storage Area (SWMU 7) are not proposed for further investigation. The proximity of these SWMUs to site soils make them susceptible to releases of hazardous waste and/or hazardous constituents that may migrate to the underlying groundwater. The close proximity of the two SWMUs should facilitate soil sampling for status confirmation. The Current Conditions Report must be revised to state that soil sampling will be performed as part of the RFI work plan and in accordance with the standard procedures and protocols.
5. Page 35 and 36, Section 4.11, SWMU 10, Waste Acid Collection Pit: This section states that the integrity of the waste acid collection pit is unknown, since the concrete pit is located beneath the tanks, is surrounded by a concrete floor, and is also unlined. This section further states that the potential for a release should be re-examined after the integrity of the waste pit is determined or by sampling soil and/or groundwater below or downgradient for the pit. At a minimum, Wellman Dynamics must propose in the RFI work plan sampling of soil and groundwater at and near the pit, and the Current Conditions Report must be revised accordingly.
6. General: The release of acidic materials to the site soils may result in increased concentrations of inorganics in the local groundwater. This should be detailed in the text of the Current Conditions Report and evaluated as part of the forthcoming RFI work plan. The inorganics associated with low pH wastes may not fully represent the extent of contamination. Analysis of total metal concentrations should be undertaken in order to fully assess the impact to the local environment.
7. General: Please provide a list of document acronyms and abbreviations to facilitate a review of the document. Include the location of this list in the Table of Contents.

The current conditions status and need for further action during the next phase of the corrective action process is adequate for SWMUs 1, 3, 4, 5, 6, 8, 9, 10, 11, and 12 and areas of concern A and B. The Current Conditions Report must be revised to include SWMUs 2 and 7 for further investigation, in accordance with our comments. Once the Current Conditions Report is approved by EPA, the RFI Workplan shall be completed in accordance with the Scope of Work for a RFI, Task II - RFI Workplan Requirements. The purpose of the RFI Workplan in combination with the Current Conditions Report is to provide enough information to define the vertical and horizontal extent of contamination to the extent necessary to assess risks to human health and environment.

If you have any questions concerning these comments, please give me a call. I may be reached at (913) 551-7627.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Ann Murrow".

Patricia Murrow
Project Manager
RCRA Corrective Action and Permits Branch
Air, RCRA and Toxics Division

cc: Cal Lundberg
IDNR